

REMARKS – Claim Rejections

- 1.0) Regarding Examiner's Response [1], Applicant notes Examiner's response and has amended pertinent claims to further clarify Applicant's invention over Examiner's cited prior art.
- 2.0) Regarding Examiner's Response [2], Applicant notes Examiner's response.
- 3.0) Regarding Examiner's Response [3], **Claim 13**;

(3.1) Firstly, Applicant has **amended Claim 13 to further clarify Applicant's claimed invention** over Examiner's cited reference.

(3.2) Secondly, **nowhere is teletext taught, or suggested in Chang** as cited by Examiner's references "Para. 0038, ll 1-12 & figure 4, entire". Furthermore, **teletext is not taught or even suggested in the entirety of Chang's invention**.

It is well known in the art that teletext television signals are **much more** than simply "a pre-defined stream of digital information forming a portion of the advertisement being displayed" (emphasis added) [Chang, Para. 0038, lines 9-11]. Please refer above to Applicant's list of teletext references in section "REMARKS - Summary", which support this well known fact.

To assert that Chang's "pre-defined stream of digital information forming a portion of the advertisement being displayed" (emphasis added) is teletext as claimed by Applicant, is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)]. Furthermore, Chang's "pre-defined stream of digital

information” would **preclude analog teletext**, which is a major part of the well-known art of teletext technology, which is claimed by Applicant.

(3.3) Thirdly, Examiner’s cited reference of Chang “Para 0041, 1-8” **does not teach or suggest**: “wherein said page of teletext data embedded in said television advertisement picture signal occurring at an advertisement teletext insertion time, said advertisement teletext insertion time occurring in non real-time to said television advertisement picture signal transmission” (emphasis added), as claimed by Applicant. Chang [Para 0041, lines 1-8] teaches an “embodiment of the present invention [wherein] a specific callback number can be set up to be active only during specific times and dates. For example, a special number may be reserved for use only during half-time of a football game. This number would have been delivered and pre-stored in an appliance (such as an Internet TV or set-top box) at the user's home. It would be activated only during the specific time(s)” (emphasis added). Applicant’s invention does **not** teach or claim “pre-stored” data “in an appliance (such as an Internet TV or set-top box) at the user's home” and which “would be activated only during the specific time(s)” as Chang teaches.

To assert that “delivered” and “pre-stored” data (i.e. a “callback number”) in a television appliance, which “would be activated only during the specific time(s)”, is equivalent to Applicant’s claimed **new and unexpected use of teletext data inserted into an advertisement’s television signal in non real-time to its transmission to a television apparatus**, is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir.

1983)]. This cited reference of Chang clearly **teaches away** from Applicant's invention.

4.0) Regarding Examiner's Response [5], **Claim 1** (Page 3);

(4.1) Examiner asserts that “Chang teaches wherein said page oftelex [sic] data associated with said television advertisement picture signal occurring at an advertisement teletext insertion time, said advertisement teletext insertion time occurring in non real-time to said television advertisement picture signal transmission (Para. 0041, 11 1-8)”. Applicant respectfully disagrees with Examiner's assertions for the following reasons:

(4.1.1) Firstly, as previously stated above in section (3.2), Chang **does not teach, or suggest teletext.**

(4.1.2) Chang [Para. 0041, lines 1-8] teaches “a specific callback number can be set up to be active only during specific times and dates. [...] This number would have been delivered and pre-stored in an appliance (such as an Internet TV or set-top box) at the user's home. It would be activated only during the specific time(s).” (emphasis added). Applicant does **not** claim that an advertisement's contact data can “be active only during specific times and dates” as taught by Chang. Furthermore, Applicant's invention does **not** claim that an advertisement's contact data “would have been delivered and pre-stored in an appliance”, which “would be activated only during the specific time(s)”. Pre-storing data in an “appliance” as taught by Chang is **not** the same as embedding / inserting advertisement teletext contact data in a “television advertisement picture signal occurring at an advertisement teletext insertion time, said advertisement teletext insertion time occurring in non real-time to said television advertisement picture signal transmission” as claimed by Applicant. See

above section (3.2) as well.

In other words, Examiner's cited reference clearly does **not** teach inserting contact information in an advertisement's picture signal as teletext, in non real-time to the transmission of the picture signal to the television viewer. To assert that Chang's "pre-defined stream of digital information forming a portion of the advertisement being displayed", which is "delivered and pre-stored in an appliance", is equivalent to the **new and unexpected use** of teletext as claimed by Applicant, is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

(4.2) On Page 4 Examiner cites references "Para. 0045, entire, & figure 3(remote control device)". Applicant respectfully disagrees with Examiner's assertions for the following reasons:

(4.2.1) Firstly, as previously stated above in section (3.2), Chang clearly **does not teach, or suggest teletext.**

(4.2.2) Secondly, "Para. 0045, entire, & figure 3(remote control device))" teaches a "user may respond off-line to an embedded internet style ad. Advertisements can be normal broadcast ads (such as TV commercials) **or embedded ads which may be pre-stored in a device connected to the TV** (such as an Internet-TV or set-top box). For example, web pages, email, or other information may be stored in a set-top box appliance for convenient leisurely offline review by a user" (emphasis added). As mentioned above in sections (3.3) and (4.1.2), Chang's pre-storing of data for "convenient leisurely offline review by a user" is **not** what Applicant claims. To assert that Chang's "embedded ads which may be pre-stored in a device connected to the TV" is the

same as Applicant's claimed extracting, on demand of **teletext** data, which has been **embedded / inserted in non real-time in an advertisement's television signal** and storing the extracted teletext data in specific television memory, is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

Applicant has modified Claim 1 to further clarify and distinguish between Applicant's invention and Examiner's cited reference of Chang.

(4.2.3) On Page 5, Examiner asserts that "Goreta teaches a wireless transceiver circuit for transmitting said page of teletext data to a remote control device [...] and for receiving a set of television advertisement data navigation instructions [...] (column 5, ll 4-9, & figure 2, labels 34 & 35), & column 5, 54-59)". Applicant respectfully disagrees with Examiner's assertions for the following reasons:

(4.2.3.1) Firstly, Goreta "column 5, ll 4-9" does **not** teach Applicant's claimed "**transmitting said page of teletext data to a remote control device upon receiving a request signal from said remote control device** for said first page selection of said television advertisement, **and for receiving a set of television advertisement data navigation instructions** into said television apparatus" (emphasis added). The cited Goreta reference teaches "existing devices A [...] for] processing and treatment means 8 for infrared signals coming from the television remote controller" [Col. 5, lines 6-8]. Using specific circuits, i.e. Goreta's "existing devices A" **in a television apparatus** to process signals received from a remote controller is well known in the art. This cited Goreta reference does **not** teach Applicant's **new and unexpected use of teletext data and a television's remote control system**, as claimed by Applicant in Claim 1, i.e. Goreta's "existing

devices A” **are clearly only part of a television apparatus and not a remote control device**, as claimed by Applicant.

(4.2.3.2) Secondly, Goreta “figure 2, **labels 34 & 35**” (emphasis added) Examiner’s specified labels do **not** exist in Goreta [Figure 2]. Labels in Goreta [Figure 2] start at “1” (Data Transmitters) and end at “13” (Automatic Switch), i.e. it is the highest numbered label in Goreta [Figure 2]. Labels “34 & 35” do **not** appear in Goreta [Figure 2].

(4.2.3.3) Thirdly, Goreta “column 5, 54-59” does **not** teach Applicant’s claimed “**transmitting said page of teletext data to a remote control device upon receiving a request signal from said remote control device for said first page selection of said television advertisement, and for receiving a set of television advertisement data navigation instructions** into said television apparatus” (emphasis added). The cited Goreta reference primarily teaches “additional means B [... an] electronic selector 11 which operates when it receives a specific code selectively loads the teletext memory 6 or the program memory 9 of the processor 10” (emphasis added). Clearly, this does **not** teach what Applicant claims, i.e. “transmitting said page of teletext data **to a remote control device** upon receiving a request signal from said remote control device for said first page selection of said television advertisement”. Goreta’s “additional means B”, is applicable **only in a television apparatus** (see at least Col. 4, lines 54-59; Col. 5, lines 1-3 and Col. 5, lines 10-18) and **not** in a remote control device as claimed by Applicant.

To assert otherwise is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

(4.2.4) On Page 5, Examiner asserts that Goreta “teaches a second page selection means for selecting said page of teletext data for display on said remote control device [...] (column 5, 24-

31, & column 4, 4-9, & figure 2, label 10) ". Applicant respectfully disagrees with Examiner's assertions for the following reasons:

(4.2.4.1) Clearly, **none** of Examiner's cited Goreta references (i.e. "column 5, 24-31, & column 4, 4-9, & figure 2, label 10") teach Applicant's claim "for display on said remote control device". Each of the cited references is now addressed:

(4.2.4.1.1) Goreta [Column 5 lines 24-31] teach a "processor 10 [which] has a connection 10d for controlling the display of data specific to the programs connected to a selector 12 between the teletext memory 6 and the teletext display 7" (emphasis added). Goreta's "teletext display 7" **is only part of a television apparatus** (see at least Col. 4, lines 54-59; Col. 5, lines 1-3 and Col. 5, lines 10-18) and **not** a remote control device as claimed by Applicant, i.e. "a second page selection means for selecting said page of teletext data **for display on said remote control device**";

(4.2.4.1.2) Goreta [Column 4, lines 4-9] teach organizing and sorting TV program shows and **not** selecting and displaying an advertisement's contact teletext data on a remote control device as claimed by Applicant; and

(4.2.4.1.3) Goreta [Figure 2, Label 10] **is a television processor** in Goreta's "additional means B", which is applicable **only in a television apparatus** (see at least Col. 4, lines 54-59; Col. 5, lines 1-3 and Col. 5, lines 10-18) and **not** in a remote control device as claimed by Applicant.

To assert that the combination of these cited references in Goreta teaches Applicant's claimed invention as claimed in Claim 1 (read in its entirety), is clearly **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is**

therefore improper [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

(4.2.5) On Page 5 (end) and Page 6 (top), Examiner cites Goreta “column 4, 54-59, & column 5, 4-9”. Applicant respectfully disagrees with Examiner’s assertions for similar reasons as cited above in section (4.2.4). To assert that the combination of these cited references in Goreta teaches Applicant’s claimed invention, is clearly **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

(4.2.6) On Page 6 Examiner states: “it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the advertisement response system of Chang [...] as taught by Goreta in order to support downloading information into a handheld device which is battery operated so that. [sic] user can access information anytime whether there I [sic] power or not”. Applicant respectfully disagrees with Examiner’s assertions for the following reasons:

(4.2.6.1) Applicant does **not** claim, as stated by Examiner, to “support downloading information into a handheld device which is battery operated so that. [sic] user can access information anytime whether there I [sic] power or not”.

(4.2.6.2) Applicant has clearly shown above in sections (4.1) through (4.2.6) that Chang in view of Goreta **does not teach, or suggest Applicant’s new and unexpected use of television teletext data and a remote control device used to navigate and to select stored pertinent advertisement contact data to contact a representative of a displayed television advertisement via a third electronic device.**

5.0) Regarding Examiner's Response re **Claim 2**, Examiner's rejection of Claim 2 is moot because **Claim 2 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta.

6.0) Regarding Examiner's Response re **Claim 3** (Page 7);

(6.1) Firstly, **Applicant has amended Claim 3** to further clarify Applicant's claimed invention.

(6.2) Secondly, **nowhere is teletext taught, or suggested in Chang** as cited by Examiner's references "figure 4, label 60, & 62, & Para. 0041, 1-8". Furthermore, **teletext is not taught or even suggested in the entirety of Chang's invention**. See as well above in section (3.2).

(6.2.1) Chang [Figure 4, labels 60 and 62] are taught in Chang as:
"advertisements [which] include an embedded callback number and may or may not display the **telephone number 62**. In each case the telephone number is included in a pre-defined stream of digital information forming a portion of the advertisement being displayed and is extracted from the data stream by the set-top box processing unit. **Icon 60 in the advertisement notifies the user that the ad being viewed is auto callback enabled**" (emphasis added. See Para. 0038).
Clearly Examiner's cited reference of "figure 4, label 60, & 62" **does not teach, or suggest** "[...] representing a page of teletext [*sic*] of said television advertisement", as stated by Examiner. As mentioned previously above in section (3.2), it is well known in the art that teletext television signals are **much more than simply** "a pre-defined stream of digital information forming a portion of the advertisement being displayed" (emphasis added) [Chang, Para. 0038, lines 9-11]. To assert that Chang's "pre-defined stream of digital information forming a portion of

the advertisement being displayed” is teletext as claimed by Applicant, is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

(6.2.2) Chang [Para. 0041, lines 1-8] teach a “further embodiment of the present invention [wherein] a specific callback number can be set up to be active only during specific times and dates. For example, a special number may be reserved for use only during half-time of a football game. This number would have been delivered and pre-stored in an appliance (such as an Internet TV or set-top box) at the user's home. It would be activated only during the specific time(s)” (emphasis added). Clearly there is **no teaching, or suggestion** of teletext in Chang as claimed by Applicant. Furthermore **nor is there any teaching or suggestion of inserting the contact data in an advertisement's television signal as teletext data, in non real-time to its broadcast to a television viewer**, as claimed by Applicant. See as well above section (3.3).

To assert that Chang's “embedded ads which may be pre-stored in a device connected to the TV”, which “would be activated only during the specific time(s)”, is the same as Applicant's claimed extracting, on demand of **teletext data, which has been embedded / inserted in non real-time in an advertisement's television signal** and storing the extracted teletext data in specific television memory and in a remote control's memory, is **conjectural modification** of a prior art disclosure which is unwarranted by such a disclosure and **is therefore improper** [Carl Schenck, A.G. v. Norton Corp., 713 F.2d 782, 218 U.S.P.Q. (BNA) 698, 702 (Fed. Cir. 1983)].

(6.3) On Page 7 Examiner states “Chang teaches a memory for storing a plurality of television advertisement teletext data [...] a

user input device [...] a set of advertisement data navigation instructions [...]”. Applicant respectfully disagrees with Examiner’s assertions for the following reasons:

(6.3.1) As mentioned above [see sections (3.2) and (6.2)], **Chang does not teach or suggest the new and unexpected use of teletext** as claimed by Applicant.

(6.3.2) Chang teaches a memory as part of a “set-top box 13” (see at least Figure 8, label 102; Para. 0066), i.e. “FIG. 8 of the drawings is a schematic diagram of the internal components of a set-top box according to the present invention. In one embodiment, set-top box 13 includes a modem 100 accepting voice and data connections 107 and 108 to the cable operator. Microprocessor and memory 102 serves to control the overall operation of the unit including codec 101, graphics engine and mux 103” (emphasis added. See Para. 0066). Applicant’s Claim 3 relates to a **remote control device and not a television apparatus / set-top box**. In other words, **all pertinent components listed in Applicant’s Claim 3 are part of Applicant’s invention’s remote control**. See as well above section (4.2.4.1.1). Applicant has modified Claim 3 to further clarify this fact.

(6.3.3) Examiner on Page 7 asserts, “Chang teaches [...] a set of navigational instructions”. Applicant respectfully disagrees with this assertion. **Nowhere is it taught or suggested in Chang** that a user can **navigate advertisement teletext data stored in a remote control device’s memory**, as claimed by Applicant in Claim 3.

(6.4) On Page 8, Examiner states, “[...] Goreta teaches a wireless circuit for transmitting a set of control signals [...] (column 3, 28-31 & column 5, 5-8)”. These references from Goreta **do not teach, or suggest, what Applicant claims in Claim 3**. Goreta does **not** teach (a) “storing a

plurality of advertisement teletext data” **in a memory on the remote control device, nor** does Goreta teach (b) an input device on the remote control “for enabling input [...] **set of television advertisement navigation instructions**” (emphasis added). Goreta simply teaches “the display of these programs on demand on the television screen itself and/or on a special remote-controller housing equipped with a small view screen” (emphasis added. See Column 3, lines 29-32) and “a teletext memory 6, a unit 7 for teletext control, display, and associated functions, and processing and treatment means 8 for infrared signals coming from the television remote controller” (Column 5, lines 5-8). Clearly Goreta’s “teletext memory 6” **is only part of a set-top box 13 and not a remote control device** (see at least Column 1, lines 64-67 and continuing to Column 2, lines 1-9; Column 4, lines 43-44; Column 4, lines 49-65; Claim 1; Claim 8), as claimed by Applicant in Claim 3. Applicant has modified Claim 3 to further clarify this fact.

(6.5) On Page 9 Examiner asserts that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the advertisement response system of Chang to include a wireless transceiver circuit [...] in order to support downloading information into handheld device which is battery operated so that user can access information anytime whether there I [sic] power or not”. Applicant respectfully disagrees with Examiner’s assertions for the following reasons:

(6.5.1) Firstly, Applicant does **not** claim in Claim 3 a “handheld device which is battery operated so that user can access information anytime whether there I [sic] power or not”.

(6.5.2) As clearly pointed out above in sections (6.1) through (6.4), Chang in view of Goreta does **not teach or suggest** Applicant’s Claim 3, Therefore it clearly would **not** “have been obvious to one of ordinary skill in the art at

the time the invention was made to modify the advertisement response system of Chang to include a wireless transceiver circuit [...]” as stated by Examiner. Hence, a *prima facie* case of obviousness **cannot** be established by Examiner’s relied upon references.

7.0) Regarding Examiner’s Response re **Claim 4** (Page 9), Examiner’s rejection of Claim 4 is (a) moot because **Claim 4 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; (b) Applicant has modified Claim 4 to further clarify claimed features, which are **not taught or suggested** in Chang in view of Goreta and (c) all of the Examiner’s references (i.e. “column 5, 24-31, figure 2, label 9”) **teach electronic components which are part of Goreta’s television apparatus and not as an integral part of a remote control device as claimed by Applicant.** See as well above sections (4.2.4.1.1), (4.2.4.1.3) and (6.3.2).

8.0) Regarding Examiner’s Response re **Claim 5** (Page 10), Examiner’s rejection of Claim 5 is (a) moot because **Claim 5 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) please refer to Applicant’s rebuttal above in section (6.5) for a similar, applicable Applicant rebuttal to Examiner’s assertions of “obvious to one of ordinary skill”.

9.0) Regarding Examiner’s Response re **Claim 7** (Page 11), Examiner’s rejection of Claim 7 is (a) moot because **Claim 7 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) as clearly pointed out above by Applicant, it would have been obvious to one of ordinary skill in the art at the time the invention was made, that Chang does **not teach, or suggest** (i) the well known art of teletext and (ii) the **new and unexpected use of teletext** as claimed by Applicant.

10.0) Regarding Examiner’s Response re **Claim 8** (Page 11), Examiner’s rejection of Claim 8 is (a) moot because **Claim 8 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta

11.0) Regarding Examiner's Response re **Claim 11** (Pages 11 and 12), Examiner's rejection of Claim 11 is (a) moot because **Claim 11 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; (b) Goreta clearly does **not teach, or suggest the use of Bluetooth** as claimed by Applicant and (c) Examiner's cited reference "figure 2, labels 1a & 1b" is **partly incorrect**, i.e. Goreta [Figure 2] does **not** have a label '1b' (Figure 2 includes labels '1' and '1a').

12.0) Regarding Examiner's Response re **Claim 12** (Page 12), Examiner's rejection of Claim 12 is (a) moot because **Claim 12 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; (b) Goreta clearly does **not teach, or suggest the use of Bluetooth** as claimed by Applicant and (c) Examiner's cited reference "figure 2, labels 1a & 1b" is **partly incorrect**, i.e. Goreta [Figure 2] does **not** have a label '1b' (Figure 2 includes labels '1' and '1a').

13.0) Regarding Examiner's Response re **Claim 14** (Pages 12- 14), Examiner's rejection of Claim 14 is (a) moot because **Claim 14 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; (b) Examiner's Goreta references ("figure 2, entire, column 5, 5-11 & 24-31") **do not teach or suggest what Applicant claims in Claim 14**, which is (i) storing TV advertisement teletext data which has been transmitted from an active TV to a remote control device and stored in a remote control's memory, (ii) being able to navigate the **teletext memory in a remote control device** and (iii) displaying **the navigated** and selected advertisement teletext data on a remote control's display and /or on an active TV display.

Clearly when Applicant's pertinent claims and invention are considered as a whole (*Graham v. John Deere*, 383 U.S. 1, 148 USPQ 459 [1966]), it would **not** have been obvious to one skilled in the art at the time the invention was made to modify Chang in view of Goreta in order to use, as asserted by Examiner on Page 14: "said remote control device as taught by Goreta in order to support downloading information into handheld device which is battery operated so that user can access information

anytime whether there I [sic] power or not”. Therefore a *prima facie* case of obviousness **cannot** be established by Examiner’s relied upon references.

14.0) Regarding Examiner’s Response re **Claim 15** (Page 14), Examiner’s rejection of Claim 15 is (a) moot because **Claim 15 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; (b) Examiner’s cited reference Goreta (“figure 2, entire, & column 5, 5-11, & 24-31”) **does not teach, or suggest** Applicant’s claimed feature “**navigating** said second memory means **in said remote control device**” (emphasis added). Please refer to Applicant’s applicable rebuttal in this instance above in sections (6.3.3) and (13.0).

Clearly when Applicant’s pertinent claims and invention are considered as a whole (*Graham v. John Deere*, 383 U.S. 1, 148 USPQ 459 [1966]), it would **not** have been obvious to one skilled in the art at the time the invention was made to modify Chang in view of Goreta in order to use, as asserted by Examiner on Page 15, “said active television apparatus as taught by Goreta in order to support downloading information into handheld device which is battery operated so that user can access information anytime whether there I [sic] power or not”. Therefore a *prima facie* case of obviousness **cannot** be established by Examiner’s relied upon references.

15.0) Regarding Examiner’s Response re **Claim 16** (Page 15), Examiner’s rejection of Claim 16 is (a) moot because **Claim 16 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) not all Applicant’s claimed electronic devices are taught by Chang.

16.0) Regarding Examiner’s Response re **Claim 17** (Page 15), Examiner’s rejection of Claim 17 is (a) moot because **Claim 17 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta.

17.0) Regarding Examiner's Response re **Claim 18** (Page 15), Examiner's rejection of Claim 18 is moot because **Claim 18 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta

18.0) Regarding Examiner's Response re **Claim 20** (Page 15), Examiner's rejection of Claim 20 is (a) moot because **Claim 20 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) as previously mentioned by Applicant [see above section (3.2)], Chang **does not teach, or suggest the use of teletext**.

19.0) Regarding Examiner's Response re **Claim 21** (Page 15), Examiner's rejection of Claim 21 is (a) moot because **Claim 21 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; (b) Chang **does not teach, or suggest the use of teletext** [see above in section (3.2)] and (c) Examiner's cited reference "figure 3, entire" **does not teach, or suggest printing** as claimed by Applicant.

20.0) Regarding Examiner's Response re **Claim 22** (Page 15), Examiner's rejection of Claim 22 is (a) moot because **Claim 22 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) Chang **does not teach, or suggest the use of teletext** [see above in section (3.2)].

21.0) Regarding Examiner's Response re **Claim 23** (Page 16), Examiner's rejection of Claim 23 is (a) moot because **Claim 23 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) Chang **does not teach, or suggest the use of teletext** [see above in section (3.2)].

22.0) Regarding Examiner's Response re **Claim 24** (Page 16), Examiner's rejection of Claim 24 is (a) moot because **Claim 24 is a Dependent Claim** and is *a fortiori* patentable over Chang in view of Goreta; and (b) Chang **does not teach, or suggest the use of teletext** [see above in section (3.2)].

Conclusion

With respect to Applicant's responses above, namely (1.0) through (22.0) in conjunction with the currently amended claims, Applicant's cited claims are part of a larger method / system which should be viewed "as a whole" (*Graham v. John Deere*, 383 U.S. 1, 148 USPQ 459 [1966]), rather than piecemeal. When viewed "as a whole", Applicant respectfully submits that the invention is *non-obvious and was not known to others* at the time that the invention was made, and hence is patentable over Chang in view of Goreta under 35 USC § 102 and § 103.

Conditional Request For Constructive Assistance

Applicant has amended the claims of this application so that they are in proper, definite, and define novel structure, which is also unobvious. If, for any reason this application is not believed to be in full condition for allowance, Applicant respectfully requests the constructive assistance and suggestions of the Examiner pursuant to M.P.E.P. §2173.02 and §707.07(j) in order that the undersigned can place this application in allowable condition as soon as possible and without the need for further proceedings.

Very Respectfully

Lester Sussman
Applicant Pro Se